

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

EZRA SMITH,)	
)	
Plaintiff,)	CIVIL ACTION FILE NO.:
)	1:24-cv-05158-TWT
v.)	
)	
DEPUTY MONIQUE TRACEY, DEPUTY)	
RAUL GOMEZ, DEPUTY SHENEQUA)	
JACKSON, and ERICA SANCHEZ,)	
)	
Defendants.)	

**DEFENDANT RAUL GOMEZ AND SHENEQUA JACKSON’S MOTION
FOR SUMMARY JUDGMENT**

COME NOW Deputy Raul Gomez (hereinafter “Deputy Gomez”) and Deputy Shenequa Jackson (hereinafter “Deputy Jackson”) (hereinafter collectively “Deputies Gomez/Jackson”), named as Defendants in the above-styled civil action, and, pursuant to Federal Rule of Civil Procedure 56, respectfully moves the Court for summary judgment. Deputies Gomez/Jackson show that they are entitled to summary judgment as a matter of law as to Plaintiff’s claims against them. This Motion for Summary Judgment is based on the following:

- A. Deputies Gomez/Jackson’s Brief in Support of their Motion for Summary Judgment;
- B. Deputies Gomez/Jackson’s Statement of Material Facts as to which there is no Genuine Issue to be Tried;

- C. Plaintiff's Deposition;
- D. Raul Gomez's Deposition;
- E. Shenequa Jackson's Deposition;
- F. Monique Tracey's Deposition;
- G. Erica Sanchez's Deposition;
- H. The entire docket related to this case, and;
- I. All other pleadings, discovery, documents and evidentiary materials in the record of the case at the time the Court considers this Motion.

WHEREFORE, Deputies Gomez/Jackson respectfully request that summary judgment be granted in their favor with regard to Plaintiff's claims against them and that the Court grant such other relief as it deems just and proper.

This 9th day of December, 2025.

Respectfully submitted,¹

**BUCKLEY CHRISTOPHER &
HENSEL, P.C.**

/s/ Timothy J. Buckley III
TIMOTHY J. BUCKLEY III
Georgia State Bar No. 092913
ERIC J. O'BRIEN
Georgia State Bar No. 383745
Attorneys for Defendants Gomez & Jackson

2970 Clairmont Road NE
Suite 650
Atlanta, Georgia 30329
(404) 633-9230 (telephone)
(404) 633-9640 (facsimile)

¹ Pursuant to Local Rule 7.1(D), I hereby certify that the foregoing has been prepared in compliance with Local Rule 5.1(B) in Times New Roman 14-point typeface.

tbuckley@bchlawpc.com
eobrien@bchlawpc.com

CERTIFICATE OF SERVICE

I hereby certify that on December 9, 2025, I electronically filed DEFENDANT RAUL GOMEZ AND SHENEQUA JACKSON'S MOTION FOR SUMMARY JUDGMENT using the CM/ECF which automatically sends email notification of such filing to attorneys of record:

Jeff Filipovits, Esq. Wingo Smith, Esq. Spears & Filipovits, LLC 315 W. Ponce de Leon Ave., Ste. 865 Decatur, Georgia 30030 jeff@civil-rights.law wingo@civil-rights.law	James M. Slater, Esq. Slater Legal PLLC 2296 Henderson Mill Rd. NE #116 Atlanta, Georgia 30345 james@slater.legal
Jason C. Waymire, Esq. Williams & Waymire 4330 South Lee Street Bldg. 400, Suite A Buford, Georgia 30581 jason@wmwlaw.com	Michael G. Frankson, Esq. Antonio E. Veal, Esq. Lindsey Adams, Esq. Huff, Powell, & Bailey, LLC 999 Peachtree Street, Ste. 950 Atlanta, Georgia 30309 mfrankson@huffpowellbailey.com aveal@huffpowellbailey.com ladams@huffpowellbailey.com

**BUCKLEY CHRISTOPHER &
HENSEL, P.C.**

2970 Clairmont Road NE
Suite 650
Atlanta, Georgia 30329
(404) 633-9230 (telephone)
(404) 633-9640 (facsimile)
tbuckley@bchlawpc.com
eobrien@bchlawpc.com

/s/ Timothy J. Buckley III
TIMOTHY J. BUCKLEY III
Georgia State Bar No. 092913
ERIC J. O'BRIEN
Georgia State Bar No. 383745
Attorneys for Defendants Gomez & Jackson